

Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON

JUAN ALBERTO
CASTANEDA MIRANDA,

Plaintiff,

vs.

U.S. DRUG
ENFORCEMENT
ADMINISTRATION, a U.S.
government agency; U.S.
FEDERAL BUREAU OF
INVESTIGATION, a U.S.
government agency; and U.S.
BUREAU OF ALCOHOL,
TOBACCO, FIREARMS &
EXPLOSIVES, a U.S.
government agency; AGENT
AGUIRE, BADGE NO. 7785,
an employee for the U.S.
federal government; AGENT
MORELAND, BADGE NO.
7701, an employee for the

FILE NO. 2:21-cv-00952-JCC

**PLAINTIFF'S RESPONSE
TO ORDER TO SHOW
CAUSE, AND**

**PLAINTIFF'S REQUEST
FOR A *VALENTIN* ORDER**

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 1

PATRICK PATTON
SALISH SEA LAW GROUP
1495 158th Place NE
Bellevue, WA 98008
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patrick@salishsealawgroup.com

U.S. federal government; and
UNKNOWN NAMED
AGENTS OF THE U.S.
FEDERAL BUREAU OF
INVESTIGATION, U.S.
DRUG ENFORCEMENT
ADMINISTRATION, U.S.
BUREAU OF ALCOHOL,
TOBACCO, FIREARMS &
EXPLOSIVES 1-10,
inclusive,

Defendants.

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

AND

PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER

Patrick Patton, WSBA No. 49159
Salish Sea Law Group PLLC
1495 158th Place NE
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(206) 330-0312 – Voice
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Attorney for Plaintiff

**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 2**

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1 Plaintiff, Juan Castaneda Miranda, respectfully responds to the Court's
2 Minute Order, dated December 7, 2021, ordering Plaintiff to show cause why
3 this case should not be dismissed against the remaining Defendants for failure
4 to prosecute.

6 I. BACKGROUND

7 Agencies have been unwilling to provide documents, records and
8 names of agents who were involved in this raid of Plaintiff, his then-girlfriend,
9 home and vehicle.

10
11 Plaintiff sent a FOIA request to Defendant Federal Bureau of
12 Investigations (FBI); this FOIA request was denied by the FBI on September
13 17, 2021. *See* Exhibit 1, Letter from Defendant FBI, Denying Request, dated
14 September 17, 2021.

15
16 On November 27, 2021, Plaintiff submitted a FOIA request online to
17 Defendant U.S. Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF).
18 As of December 16, 2021, the ATF has not responded to this FOIA request.
19 *See* Exhibit 2, SecureRelease Portal FOIA Request, dated November 27,
20 2021.

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22 On November 30, 2021, Plaintiff sent a FOIA request to Defendant
23 Drug Enforcement Agency (DEA), requesting all records regarding this
24

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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 3

1 incident, in a further effort to identify the specific DEA agents who were
2 assigned and involved in this incident. The DEA has only responded stating
3 they received this FOIA request. *See* Exhibit 3, FOIA request to Defendant
4 DEA, dated November 30, 2021, and receipt confirmation via e-mail dated
5 December 16, 2021.
6

7 On November 30, 2021, Plaintiff sent a second FOIA request to
8 Defendant FBI. As of December 16, 2021, the FBI has not responded to this
9 record request. *See* Exhibit 4, FOIA request to Defendant FBI, dated
10 November 30, 2021.
11

12 Based upon these pending FOIA requests and Plaintiff's continued
13 efforts to determine the specific agents involved in this raid, Plaintiff
14 respectfully requests the Court not dismiss this case, and issue a *Valentin* order
15 requiring that all agents involved in orchestrating, and executing the raid, be
16 identified so that they can be properly served and named in this lawsuit.
17 Alternatively, Plaintiff requests an additional three months, or however long
18 the court sees fit, to exhaust efforts to complete discovery to determine the
19 Defendant agents in this matter.
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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 4

II. LEGAL ARGUMENT

Plaintiff looks to the matter of *Valentin v. Dinkins, et al.*, 121 F.3d 72 (1997), in his request to the court that an order be granted to identify agents involved in the raid that occurred at the Defendant's apartment on July 13th, 2018.

It is a general principle of tort law that a tort victim who cannot identify the tortfeasor can still bring suit. *See Billman v. Indiana Dep't of Corrections*, 56 F.3d 785, 789 (7th Cir. 1995). In *Billman*, the 7th Circuit reversed the sua sponte dismissal of a complaint because Plaintiff had not referred to the Defendant corrections officer by name. The Court stated that plaintiff's "initial inability to identify the injurers is not by itself a proper ground for the dismissal of the suit," as this would "gratuitously prevent [plaintiff] from using the tools of pretrial discovery to discover the defendants' identity." *Id.* *See also Maclin v. Paulson*, 627 F.2d 83, 87 (7th Cir. 1980) (when "a party is ignorant of defendants' true identity, it is unnecessary to name them until their identity can be learned through discovery or through the aid of the trial court"). The Eighth and Ninth Circuits have adopted similar stances. *See Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985) ("Rather than dismissing

1 the claim, the court should have ordered disclosure of Officer Doe's identity
2 by other defendants named and served or permitted the plaintiff to identify the
3 unknown defendants, unless it is clear that discovery would not uncover the
4 identities, or that the complaint would be dismissed on other grounds").

5
6 *Valentin's* case provides a paradigmatic example of why an order is
7 necessary so a Defendant may be fully identified. 121 F.3d 72 (1997).
8 Plaintiff in the case at hand, has made concerted efforts to try and identify the
9 Defendant agents, but Defendant agencies have consistently refused, blocked,
10 and prevented Plaintiff, Juan Castaneda Miranda, from receiving the
11 discovery, in order to identify the Agents, that participated in the raid at the
12 Plaintiffs place of residence on July 13th, 2018.
13

14
15 Because Defendants have been uncooperative in providing the names
16 of the agents that participated in the raid, FOIA requests have not been
17 successful and there has been no indication that they will succeed, Plaintiff
18 has been prejudiced in bringing his claim and showing this court the merits of
19 his claim in litigation. Plaintiff respectfully requests that the court issue a
20 *Valentin's* order so that he can ascertain the names of the agents involved and
21 attempt to properly serve them.
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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 6

1 Alternatively, Plaintiff respectfully requests that the court allow him an
 2 extension of three months to determine whether the specific agents' names
 3 can be ascertained via the FOIA requests. If names are ascertained within 3
 4 months, Plaintiffs requests leave of the court to amend the Complaint to name
 5 these agents, and properly serve them in this matter. If names are not
 6 ascertained within 3 months, Plaintiff asks the court to subsequently issue a
 7 *Valentin* order, or whatever order the court deems fit, in order to ascertain the
 8 names of the unknown named agents, and allow time to serve the agents, and
 9 proceed with case.
 10
 11

12 **III. CONCLUSION & RELIEF REQUESTED**

13 WHEREFORE, Plaintiff, Juan Castaneda Miranda, respectfully
 14 requests the Court to enter an Order:
 15

16 1. Requiring Defendant agencies to identify, disclose and provide
 17 the names and contact information for all agents involved in, and at the scene
 18 of this incident of July 17, 2018; these disclosures to be completed and
 19 provided to the Plaintiff no later than 60 days after the order is issued.
 20

21 2. Alternatively, Plaintiff respectfully requests that the court allow
 22 him an extension of three months to determine whether the involved agents'
 23 names can be ascertained via the FOIA requests.
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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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3. If involved agent's names are not ascertained after three months, Plaintiff asks the court to subsequently issue a *Valentin* order, or an order the court deems fit, in order to ascertain the names of the unknown named agents, and allow time to serve the agents, and proceed with case.

RESPECTFULLY SUBMITTED this 16th day of December 2021.

/s/ Patrick Patton

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Attorney for Plaintiff

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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government agency; and
U.S. BUREAU OF
ALCOHOL, TOBACCO,
FIREARMS &
EXPLOSIVES, a U.S.
government agency;
AGENT AGUIRE, BADGE
NO. 7785, an employee for
the U.S. federal government;
AGENT MORELAND,
BADGE NO. 7701, an

FILE NO. 2:21-cv-00952-JCC

**DECLARATION OF PATRICK
PATTON REGARDING
SUBMISSION OF FOIA
REQUESTS**

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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employee for the U.S.
federal government; and
UNKNOWN NAMED
AGENTS OF THE U.S.
FEDERAL BUREAU OF
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ADMINISTRATION, U.S.
BUREAU OF ALCOHOL,
TOBACCO, FIREARMS &
EXPLOSIVES 1-10,
inclusive,

Defendants.

I, Patrick Patton, declare the following under the penalty of perjury:

I am over the age of 18 years and otherwise qualified to testify:

1. I am the attorney for the Plaintiff in this matter, and I make this Declaration based upon my own knowledge.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the denial letter, dated September 17, 2021, of the FOIA request submitted to the FBI.
3. Attached hereto as **Exhibit 2** is a true and correct copy of the FOIA request submitted to the ATF on November 27, 2021.
4. Attached hereto as **Exhibit 3** is a true and correct copy of the FOIA request and the certification of identity submitted to the DEA November 30, 2021.
5. Attached hereto as **Exhibit 4** is a true and correct copy of the FOIA request and the certification of identity submitted to the FBI November 30, 2021.

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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1
2 **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS**
3 **OF THE STATE OF WASHINGTON THAT THE FOREGOING IS**
4 **TRUE AND CORRECT.**

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7 Dated this 16th day of December 2021.
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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 11

EXHIBIT 1



U.S. Department of Justice

Federal Bureau of Investigation
Washington, D.C. 20535

September 17, 2021

MS. CHRISTINE PHILLIPS
SALISH SEA LAW GROUP LLC
1495 158TH PLACE NORTH EAST
BELLEVUE, WA 98008

Request No.: 1505037-000
Subject: Raid on Mr. Juan Miranda's
Apartment
(July 2018)

Dear Ms. Phillips:

This acknowledges receipt of your Freedom of Information/Privacy Acts (FOIPA) request to the FBI on behalf of your client. The FOIPA Request Number listed above has been assigned to your request. Below you will find information relevant to your request. Please read each item carefully.

You have requested records on one or more third party individuals. Please be advised the FBI will neither confirm nor deny the existence of such records pursuant to FOIA exemptions (b)(6) and (b)(7)(C), 5 U.S.C. §§ 552 (b)(6) and (b)(7)(C). The mere acknowledgement of the existence of FBI records on third party individuals could reasonably be expected to constitute an unwarranted invasion of personal privacy. This is our standard response to such requests and should not be taken to mean that records do, or do not, exist. As a result, your request has been closed. To reopen your request, please complete and return the attached Certification of Identity form. Your name must be listed in the "Authorization to Release Information to Another Person" field.

If you submitted your request through the FBI's eFOIPA portal and you are receiving correspondence through standard mail, it was determined your request did not meet the eFOIPA terms of service.

For questions regarding our determinations, visit the www.fbi.gov/foia website under "Contact Us." The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20535, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

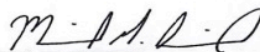
PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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1
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3 You may seek dispute resolution services by contacting the Office of Government Information
4 Services (OGIS). The contact information for OGIS is as follows: Office of Government Information
5 Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland
6 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile
7 at 202-741-5769. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing
8 foipaquestions@fbi.gov. If you submit your dispute resolution correspondence by email, the subject heading
9 should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to
10 your request so it may be easily identified.

11
12 Enclosed for your information is a copy of the Explanation of Exemptions.

13
14 Sincerely,

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16 

17
18 Michael G. Seidel
19 Section Chief
20 Record/Information
21 Dissemination Section
22 Information Management Division

23
24 Enclosure(s)

25
PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 13

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EXHIBIT 2

SecureRelease™ Portal11/27/21, 14:11 PM

SecureRelease™ PortalChristine Phillipschristine@salishsealawgroup.com

Request Number: Pending

Details of Request

(Read only details of request)

Request Description:

Our office represents Mr. Juan Castaneda Miranda, whom ATF, FBI and DEA raided Mr. Castaneda Miranda's apartment in Lynnwood, Washington on July 17, 2018. Please provide our office with a complete, legible, unredacted copy of the ATF's records regarding this raid, including, but not limited to warrant(s), reports, photographs, audio and visual recordings, correspondence, etc. related to ATF's involvement of this raid on Mr. Castaneda Miranda and his home on July 17, 2018 at the Viking Apartments at 6630 202nd Street, Lynnwood, Washington.

Fee Waiver Requested?:

Not Requested

Reason for Fee Waiver:

-

Expedited Processing?:

Not Requested

Agency:

Department of Justice

Component:

Bureau of Alcohol, Tobacco, Firearms, and Explosives

Processing Track:

TBD

Request Type:

FOIA

Submitted Date:

11/27/2021

Request Status:

Submitted - Pending Review

Files uploaded by user

Q Search

File Name

Attachment Type

No attachments to display

5 rows |< < 0-0 of 0 >

PLAINTIFF’S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF’S REQUEST FOR A *VALENTIN* ORDER - 14

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EXHIBIT 3

SALISH SEA LAW GROUP, PLLC
PATRICK PATTON, ATTORNEY AT LAW

30 November 2021

DEA FOIA/Records Management Section
Attn: FOIA/PA Unit (FSRF)
8701 Morrisette Drive
Springfield, Virginia 22152

Re: Client : Juan Castaneda Miranda
Date of Incident : July 17, 2018
Location : Viking Apartments
6630 202nd Street
Lynnwood, WA 98036

Dear FOIA Officer:

This is a request under the Freedom of Information Act.

Attached please find a completed and signed *Certification of Identity* (DOJ Form 361).

Our office represents Mr. Juan Castaneda Miranda, whom ATF, FBI and DEA raided Mr. Castaneda Miranda's apartment on July 17, 2018, only to learn that they had the incorrect apartment and person. The individual the agents were allegedly looking for was Jose Verduzco Urias, who was subsequently arrested on this date in the parking lot of the Viking Apartments.

Please provide our office with a complete, legible, unredacted copy of the ATF's records regarding this raid, including, but not limited to warrant(s), reports, photographs, audio and visual recordings, correspondence, etc. related to ATF's involvement of this raid on Mr. Castaneda Miranda and his home on July 17, 2018 at the Viking Apartments at 6630 202nd Street, Lynnwood, Washington.

If you have any questions or need additional information regarding this request, please feel free to contact me at (206) 979-3514 or by e-mail at christine@salishsealawgroup.com.

Thank you for your assistance.

Sincerely,



Christine Phillips

cc: Mr. Juan Castaneda Miranda

Enclosure: As Stated Above



SALISH SEA LAW GROUP

T: 206-972-LAWS (5297)

F: 206-770-6238

Patrick@SalishSeaLawGroup.com
1495 158th Avenue NE
Bellevue, WA 98008
www.SalishSeaLawGroup.com

**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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U.S. Department of Justice

Certification of Identity

FORM APPROVED OMB NO. 1103-0016
EXPIRES 05/31/2023

Privacy Act Statement. In accordance with 28 CFR Section 16.41(d) personal data sufficient to identify the individuals submitting requests by mail under the Privacy Act of 1974, 5 U.S.C. Section 552a, is required. The purpose of this solicitation is to ensure that the records of individuals who are the subject of U.S. Department of Justice systems of records are not wrongfully disclosed by the Department. Requests will not be processed if this information is not furnished. False information on this form may subject the requester to criminal penalties under 18 U.S.C. Section 1001 and/or 5 U.S.C. Section 552a(i)(3).

Public reporting burden for this collection of information is estimated to average 0.50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Suggestions for reducing this burden may be submitted to the Office of Information and Regulatory Affairs, Office of Management and Budget, Public Use Reports Project (1103-0016), Washington, DC 20503.

Full Name of Requester ¹ Juan Alberto Castaneda Miranda A-204-503-378Citizenship Status ² Approved DACA Social Security Number ³ 010-41-2261Current Address 509 Kerr Avenue, Modesto, California 95354Date of Birth 05/25/1992 Place of Birth Mexico**OPTIONAL: Authorization to Release Information to Another Person**

This form is also to be completed by a requester who is authorizing information relating to himself or herself to be released to another person.

Further, pursuant to 5 U.S.C. Section 552a(b), I authorize the U.S. Department of Justice to release any and all information relating to me to:

Patrick Patton, Salish Sea Law Group, PLLC 1495 158th Place NE, Bellevue, Washington 98008

Print or Type Name

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am the person named above, and I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. Section 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years or both, and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of 5 U.S.C. 552a(i)(3) by a fine of not more than \$5,000.

Signature ⁴ Juan Castaneda Date 11/29/2021

¹Name of individual who is the subject of the record(s) sought.

²Individual submitting a request under the Privacy Act of 1974 must be either "a citizen of the United States or an alien lawfully admitted for permanent residence," pursuant to 5 U.S.C. Section 552a(a)(2). Requests will be processed as Freedom of Information Act requests pursuant to 5 U.S.C. Section 552, rather than Privacy Act requests, for individuals who are not United States citizens or aliens lawfully admitted for permanent residence.

³Providing your social security number is voluntary. You are asked to provide your social security number only to facilitate the identification of records relating to you. Without your social security number, the Department may be unable to locate any or all records pertaining to you.

⁴Signature of individual who is the subject of the record sought.

FORM DOJ-361

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 16

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From: Patrick Patton patrick@salishsealawgroup.com
Subject: Fwd: DEA FOIA/PA Case Number: 22-00114-P
Date: 16 December 2021 at 08:17 AM
To: Christine Phillips christine@salishsealawgroup.com

PP

----- Forwarded message -----

From: <Lidia.Eyob@dea.gov>
Date: Thu, Dec 16, 2021, 07:49
Subject: DEA FOIA/PA Case Number: 22-00114-P
To: <Patrick@salishsealawgroup.com>

Dear Ms. Phillips:

This is to acknowledge receipt of your Freedom of Information Act/Privacy Act (FOIA/PA) request by the Drug Enforcement Administration, FOIA/PA Section. This response is a courtesy reply. It does not replace the acknowledgement letter that will be sent to you once your request has been reviewed by our Intake Unit. Please note, requests are handled in the order they are received. We will advise you if any additional information is required.

Please be advised, due to necessary operational changes as a result of the national emergency concerning the novel coronavirus disease (COVID-19) outbreak, there may be some delay in the processing of your request.

You may wish to visit DEA's public facing website at www.dea.gov or the FOIA Library available at FOIA Library | DEA.gov to determine if the information you seek is already available to the public.

You may contact our FOIA Public Liaison at (571) 776-3139 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at (202) 741-5770; toll free at 1-877-684-6448; or facsimile at (202) 741-5769.

If you have any questions regarding this email, you may contact our FOIA Requester Service Center at (571) 776-2300. Thank you for your patience as we work to complete the processing of your request.

Sincerely,

Lidia Eyob
 FOIA/PA Specialist
 Intake Sub-Unit
 FOIA/PA Unit
 Drug Enforcement Administration
 E-mail: Lidia.Eyob@dea.gov

PRIVACY ACT NOTICE: This e-mail (including any attachments herein) may contain personal and privileged information that requires protection in compliance with the Privacy Act of 1974 (5 U.S.C. § 552a). Any use of this information by anyone other than the intended recipient is prohibited. If you have received this communication in error, please immediately delete all copies of this information and notify me by e-mail. The use, dissemination, distribution, or reproduction of this communication by unintended recipients is not authorized and may be unlawful.

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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EXHIBIT 4

SALISH SEA LAW GROUP, PLLC
PATRICK PATTON, ATTORNEY AT LAW

30 November 2021

Michael G. Seidel, Section Chief
Record/Information Dissemination Section
Information Management Division
U.S. Department of Justice
Federal Bureau of Investigation
170 Marcel Drive
Winchester, VA 22602-4843

Re: Client : **Juan Castaneda Miranda**
Date of Incident : **July 17, 2018**
Location : **Viking Apartments**
6630 202nd Street
Lynnwood, WA 98036
Request No. : **1505037-000**

Dear FOIA Officer:

This is a request under the Freedom of Information Act.

Attached please find a completed and signed *Certification of Identity* (DOJ Form 361).

Our office represents Mr. Juan Castaneda Miranda, whom ATF, FBI and DEA raided Mr. Castaneda Miranda's apartment on July 17, 2018, only to learn that they had the incorrect apartment and person. The individual the agents were allegedly looking for was Jose Verduzco Urias, who was subsequently arrested on this date in the parking lot of the Viking Apartments.

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**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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patrick@salishsealawgroup.com

SALISH SEA LAW GROUP, PLLC
PATRICK PATTON, ATTORNEY AT LAW

If you have any questions or need additional information regarding this request, please feel free to contact me at (206) 979-3514 or by e-mail at christine@salishsealawgroup.com.

Thank you for your assistance.

Sincerely,



Christine Phillips

cc: Mr. Juan Castaneda Miranda

Enclosure: As Stated Above



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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 19

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U.S. Department of Justice

Certification of Identity

FORM APPROVED OMB NO. 1103-0016
EXPIRES 05/31/2023

Privacy Act Statement. In accordance with 28 CFR Section 16.41(d) personal data sufficient to identify the individuals submitting requests by mail under the Privacy Act of 1974, 5 U.S.C. Section 552a, is required. The purpose of this solicitation is to ensure that the records of individuals who are the subject of U.S. Department of Justice systems of records are not wrongfully disclosed by the Department. Requests will not be processed if this information is not furnished. False information on this form may subject the requester to criminal penalties under 18 U.S.C. Section 1001 and/or 5 U.S.C. Section 552a(i)(3).

Public reporting burden for this collection of information is estimated to average 0.50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Suggestions for reducing this burden may be submitted to the Office of Information and Regulatory Affairs, Office of Management and Budget, Public Use Reports Project (1103-0016), Washington, DC 20503.

Full Name of Requester ¹ Juan Alberto Castaneda Miranda A-204-503-378Citizenship Status ² Approved DACA Social Security Number ³ 010-41-2261

Current Address 509 Kerr Avenue, Modesto, California 95354

Date of Birth 05/25/1992 Place of Birth Mexico

OPTIONAL: Authorization to Release Information to Another Person

This form is also to be completed by a requester who is authorizing information relating to himself or herself to be released to another person.

Further, pursuant to 5 U.S.C. Section 552a(b), I authorize the U.S. Department of Justice to release any and all information relating to me to:

Patrick Patton, Salish Sea Law Group, PLLC 1495 158th Place NE, Bellevue, Washington 98008

Print or Type Name

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am the person named above, and I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. Section 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years or both, and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of 5 U.S.C. 552a(i)(3) by a fine of not more than \$5,000.

Signature ⁴ Juan Castaneda Date 11/29/2021

¹ Name of individual who is the subject of the record(s) sought.

² Individual submitting a request under the Privacy Act of 1974 must be either "a citizen of the United States or an alien lawfully admitted for permanent residence," pursuant to 5 U.S.C. Section 552a(a)(2). Requests will be processed as Freedom of Information Act requests pursuant to 5 U.S.C. Section 552, rather than Privacy Act requests, for individuals who are not United States citizens or aliens lawfully admitted for permanent residence.

³ Providing your social security number is voluntary. You are asked to provide your social security number only to facilitate the identification of records relating to you. Without your social security number, the Department may be unable to locate any or all records pertaining to you.

⁴ Signature of individual who is the subject of the record sought.

FORM DOJ-361

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 20

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